

EXHIBIT H

From: [Anna Porto](#)
To: [Ercolini, Michael](#); singular@princelobel.com
Cc: [kvp-singular](#); abhansali@kblfirm.com; wgs-singularv.google@wolfgreenfield.com; mkwun@kblfirm.com
Subject: Singular Computing LLC v. Google LLC, 1:19-cv-12551 FDS
Date: Friday, May 7, 2021 11:10:54 AM
Attachments: [Revised search terms 5.7.2021.xlsx](#)

Michael,

During our meet and confer yesterday, you said that Singular planned to make rolling productions over the next two weeks in response to Google's search terms that Singular found non-objectionable. Some of those documents relate to three different third-parties, and Singular is currently in the process of seeking consent from those third parties prior to producing their documents.

You also described Singular's position on Google's remaining search terms. Specifically, you explained for the first time that your most recent email on the topic, dated April 7, was intended to ask Google to pare down its remaining terms to 20 or fewer (whereas we had understood you to be limiting Google to no more than 20 *additional* terms). Regarding the remaining terms Google has proposed, Singular has not yet begun its production, and will not do so until Google narrows those terms. Regardless, however, Singular plans to complete its ESI production by June 1st.

Additionally, you explained that you contacted your vendor yesterday regarding the hit count discrepancy we raised via email on April 12. Your vendor explained that the discrepancy was caused by Singular's addition of calendar invites to those counts.

Please let me know if any of the above is inconsistent with Singular's position on these issues.

Finally, we attach Google's narrowed search terms, per our discussion.

Thanks,
Anna

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